

JAP:BAS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

17 M 0683

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(T. 18, U.S.C., § 371)

RUSSELL JACOB and
DARRYL CARRINGTON

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS.:

KELLI WEBB, being duly sworn, deposes and says that she is a Postal Inspector with the United States Postal Inspection Service ("USPIS"), duly appointed according to law and acting as such.

On or about July 20, 2017, within the Eastern District of New York, the defendants RUSSELL JACOB and DARRYL CARRINGTON did knowingly and intentionally conspire to steal, take and abstract articles and things from mail, package, bag, mail route and other authorized depository for mail matter, in violation of Title 18, United States Code, Section 1708.

(Title 18, United States Code, Section 371).

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I am a United States Postal Inspector and have been involved in the investigation of numerous cases involving mail theft. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my conversations with other law enforcement officials; and my review of reports of other law enforcement officers involved in the investigation.

2. Based on my training and experience, I have learned some of the methods by which individuals steal mail from United States Postal Service ("USPS") collection boxes and mail receptacles. I have learned, among other things, that small, hand-held objects like rat traps, which are covered in sticky residue, are often used to extract mail from USPS collection boxes. Mail thieves then remove checks, money orders, and other items of value from the extracted mail.

3. On or about July 20, 2017, New York City Police Department ("NYPD") officers on patrol observed the defendants tampering with a USPS collection box located at the corner of Avenue M and East 24th in Brooklyn, New York.

4. The NYPD officers proceeded to follow the defendants and observed them tampering with a USPS collection box located at Avenue L and East 24th Street and then another USPS collection box located at Avenue K and Nostrand Avenue.

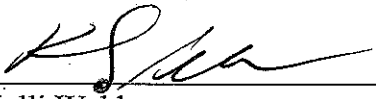
¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

5. The NYPD officers then followed the defendants eastbound on Avenue K and attempted to stop them at Avenue K and East 40th Street. After a pursuit, the NYPD officers apprehended RUSSEL JACOB at Avenue K and East 42nd Street. The officers then searched his backpack and found a device wrapped in duct-tape with a sticky substance affixed to the outside and a shoelace tied to it, which can be used to extract mail from a collection box. The officers also found pieces of mail that were not addressed to or sent by either defendant.

6. The officers then issued a radio alert for a man fitting the description of DARRYL CARRINGTON. CARRINGTON was subsequently located by officers at Avenue K and East 40th street. CARRINGTON was arrested and officers searched a plastic bag that he had discarded. The bag contained numerous pieces of mail that were not addressed to or sent by either defendant. The bag also contained materials, such as glue traps, that could be used to extract mail from a collection box.


WHEREFORE, your deponent respectfully requests that the defendants
RUSSELL JACOB and DARRYL CARRINGTON be dealt with according to law.

Dated: Brooklyn, New York
July 20, 2017



Kelli Webb
Postal Inspector
United States Postal Inspection Service

Sworn to before me this
20th day of July, 2017



THE HONORABLE STEVEN L. TISCIONE
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

